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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

**ST. MATTHEW'S UNIVERSITY
 (CAYMAN) LTD., a Cayman Islands
 company,**

Plaintiff,

vs.

**SABA UNIVERSITY SCHOOL OF
 MEDICINE FOUNDATION, a Netherland-
 Antilles company; MEDICAL
 UNIVERSITY OF THE AMERICAS, a St.
 Kitts & Nevis company; EDUCATION
 INFORMATION CONSULTANTS, INC., a
 Massachusetts corporation;
 EDUCATIONAL INTERNATIONAL
 CONSULTANTS, LLC, a Massachusetts
 limited liability company; PATRICIA L.
 HOUGH, M.D. an individual, and d.b.a.
 "Saba University School of Medicine";
 DAVID L. FREDRICK, an individual;
 PANKAJ DESAI, M.D., an individual;
 ASSOCIATION OF AMERICAN
 INTERNATIONAL MEDICAL
 GRADUATES, INC., a Nevada
 corporation, a.k.a. "aaimg@yahoo.com";
 THOMAS MOORE, M.D. a.k.a.
 "presaaimg@hotmail.com" and
 "crocdoc2004@netzero.net," an
 individual; SARAH B. WEINSTEIN a.k.a.
 "execsecaaimg@hotmail.com," an
 individual; RACHAEL E. SILVER, an
 individual; and DIEDRE MOORE, an
 individual,**

Defendants.

Case No. 2:05-CV-00848-BES-LRL

**JOINT MOTION FOR STAY OF ALL
 PROCEEDINGS**

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1 Plaintiff in the above-captioned matter, St. Matthew's University (Cayman), Ltd.
 2 ("SMU"), and appearing defendants Saba University School of Medicine Foundation ("Saba
 3 University"); the Association of American Medical School Graduates, Inc. ("AAIMG"),
 4 Education Information Consultants, Inc. ("EIC, INC."); Educational International
 5 Consultants, LLC ("EIC, LLC"), David L. Fredrick, Patricia L. Hough, M.D., and Pankaj
 6 Desai, M.D. (the "Appearing Defendants"), (together, the "Parties"), hereby jointly request
 7 this Court to stay all actions in light of a pending settlement agreement, until and including
 8 June 30, 2007, in accordance with the form of proposed order submitted herewith. In
 9 support of this motion, the Parties respectfully represent as follows:

10 1. SMU filed the within action in the United States District Court for the District of
 11 Nevada captioned St. Matthew's University (Cayman) Ltd v. SABA University School of
 12 Medicine Foundation et al, Civil Action No. CV-S-05-0848-RCJ(LRL) (the "Litigation"), and
 13 have been actively engaged in the prosecution of the claims and defenses presented in the
 14 Litigation since the inception of this matter;

15 2. The Parties represent that they have entered into comprehensive agreement
 16 that includes a) a corporate transaction ("Transaction") between the Parties, and b) an
 17 agreement to settle all the disputes in the Litigation that will become binding upon the
 18 closing ("Closing") of the Transaction, such Closing to occur before June 30, 2007. The
 19 Parties further represent that there are several prerequisite events that must occur before a
 20 Closing, and such events include, among other things, the lapse of certain statutory waiting
 21 periods related to the Transaction, and the Parties obtaining certain acknowledgements
 22 from foreign jurisdictions.

23 3. It is in the interest of all of the Parties for the Transaction to reach the Closing.
 24 In furtherance of this goal, the Parties wish to avoid the substantial cost and expense
 25 associated with continuing with this Litigation during the time that the Parties will be actively
 26 engaged in a good faith attempt to move the Transaction to the Closing, which, if such
 27 Closing occurs, will be followed by a stipulated request by all the Parties to the Court to
 28 dismiss the Litigation;

1 Dated: February 22, 2007

ALVERSON TAYLOR MORTENSEN & SANDERS

2 By: 

3 Bruce A. Alverson, Esq.

4 Nathan Reinmiller, Esq.

ALVERSON TAYLOR MORTENSEN & SANDERS

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Counsel for Defendants

ASSOCIATION OF AMERICAN INTERNATIONAL

MEDICAL GRADUATES, INC., SABA UNIVERSITY

SCHOOL OF MEDICINE FOUNDATION, LTD.,

MEDICAL UNIVERSITY OF THE AMERICAS,

EDUCATION INFORMATION CONSULTANTS, INC.,

EDUCATIONAL INTERNATIONAL CONSULTANTS,

LLC, PATRICIA L. HOUGH, M.D., DAVID L. FREDRICK,

and PANKAJ DESAI, M.D.

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1 4. The Parties respectfully represent that a stay of these proceedings until June
2 30, 2007, upon the terms and conditions set forth in the attached proposed form of order
3 staying proceedings, will afford the Parties the additional time needed to move the
4 Transaction to a Closing;

5 5. The Parties further represent that no party to this Litigation will be prejudiced
6 by the requested stay, and that the requested stay will serve the interests of conserving
7 judicial resources;

8 6. The Parties have further agreed that neither the filing of this joint motion nor the
9 filing of any previous joint motion shall be deemed to operate as or effect a waiver of any
10 claims or defenses that any party was entitled to or has asserted prior to the filing of this or
11 any previous joint motion to stay, including, without limitation, any and all defenses based
12 on lack of personal jurisdiction.

13 WHEREFORE, the Parties respectfully request that this Court enter an order staying
14 these proceedings upon the terms and conditions reflected in the attached proposed form
15 of Order.

16 Respectfully Submitted,

17 Dated: February 22, 2007

GREENBERG TRAURIG, LLP

By: 

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